

# EXHIBIT D

**JILL DILLARD vs CITY OF SPRINGDALE  
SEEWALD, JESSA on 09/13/2021**

1                                   IN THE UNITED STATES DISTRICT COURT  
2                                   WESTERN DISTRICT OF ARKANSAS  
3                                   FAYETTEVILLE DIVISION  
4                                   JILL DILLARD, JESSA SEEWALD,                                   )  
5                                   JINGER VUOLO, and JOY DUGGAR,                                   )  
6                                   PLAINTIFFS,                                   )  
7                                   VS.                                   )  
8                                   CITY OF SPRINGDALE, ARKANSAS;                                   )  
9                                   WASHINGTON COUNTY, ARKANSAS;                                   )  
10                                   KATHY O'KELLEY, in her Individual                                   )  
11                                   and Official Capacities; ERNEST                                   )  
12                                   CATE, in his Individual and                                   )  
13                                   Official Capacities; RICK HOYT,                                   )  
14                                   in his Individual and Official                                   )  
15                                   Capacities; STEVE ZEGA, in his                                   )  
16                                   Official Capacity;                                   )  
17                                   Does 1-10, Inclusive,                                   )  
18                                   DEFENDANTS.                                   )

12                                   -----  
13                                   ORAL AND VIDEOTAPED DEPOSITION OF  
14                                   JESSA SEEWALD  
15                                   September 13, 2021  
16                                   -----

17                                   ORAL AND VIDEOTAPED DEPOSITION OF JESSA SEEWALD,  
18                                   produced as a witness at the instance of the  
19                                   DEFENDANTS, and duly sworn, was taken in the  
20                                   above-styled and numbered cause on the 13th day of  
21                                   September, 2021, from 10:03 a.m. to 2:57 p.m., before  
22                                   Tammie L. Foreman, CCR in and for the State of  
23                                   Arkansas, RPR, CRR, reported by machine shorthand, via  
24                                   audio-video conference, pursuant to the Federal Rules  
25                                   of Civil Procedure.



1 Q. Okay. You mentioned that your father called you  
2 and told you about it. Do you -- do you remember any  
3 other conversations you had with your dad about the  
4 situation of the release of the redacted report?

5 A. Not right then. Like, I know we talked about it  
6 from time to time.

7 Q. Uh-huh. In those conversations, do you recall  
8 him telling you that he spoke to people at the police  
9 department prior to the release of the report?

10 A. I don't think so.

11 Q. I think you -- I don't want to -- I don't  
12 remember the exact words you used. I think you  
13 mentioned that he shared with you the teaser report  
14 because he said something is coming or something --

15 A. He told me about the first In Touch article that  
16 kind of was like a teaser to what they were going to  
17 be releasing the next day. So I think I read that  
18 whenever that was, like the day before or something  
19 like that.

20 Q. But he didn't tell you that he had been on the  
21 phone with anybody at the police department?

22 A. No. Not that I'm -- not that I can remember. I  
23 don't think so.

24 Q. You know a Chad Gallagher, yes?

25 A. Yes.

1 Q. Do you recall Chad ever talking to you either --  
2 let's say this. Do you remember Chad ever talking to  
3 you about before the teaser came out about something  
4 is going to come out before the teaser?

5 A. I don't remember, honestly. I don't remember  
6 if -- I thought that, like, when that teaser article  
7 came out, that was, like, the first I remember hearing  
8 of it.

9 Q. Okay.

10 A. But I don't know.

11 Q. And I want to be clear. You heard of it -- when  
12 you say -- well, okay. How about Chad, did he ever  
13 tell you that he talked to the Springdale Police  
14 Department prior to the information being released?

15 A. I don't think so.

16 Q. Okay. So sitting here today, do you know who  
17 actually put the redacted report on the internet? Do  
18 you know who did that?

19 A. Who was the first to release it publically?  
20 In Touch.

21 Q. Pardon?

22 A. Didn't In Touch?

23 Q. I think so, but I wanted to know what you knew  
24 about that.

25 A. Yeah. I know that it was sent, like, not fully

## REPORTER CERTIFICATION

STATE OF ARKANSAS )

COUNTY OF PULASKI )

I, TAMMIE L. FOREMAN, Certified Court Reporter in and for the aforesaid county and state, do hereby certify to the following:

1) The foregoing deposition was taken before me at the time and place stated in the foregoing styled cause with the appearances as noted;

2) Being a Certified Court Reporter, I then reported the deposition in Stenotype to the best of my skill and ability, and the foregoing pages contain a full, true, and correct transcript of my said Stenotype notes then and there taken;

3) I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved;

4) Signature of the witness is not waived.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 30th day of September 2021.



A handwritten signature in cursive script that reads "Tammie L. Foreman".

TAMMIE L. FOREMAN, CCR, RPR, CRR  
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